

QUINN EMANUEL URQUHART & SULLIVAN, LLP
Charles K. Verhoeven (Bar No. 170151)
charlesverhoeven@quinnmanuel.com
Melissa Baily (Bar No. 237649)
melissabaily@quinnmanuel.com
Lindsay Cooper (Bar No. 287125)
lindsaycooper@quinnmanuel.com
50 California Street, 22nd Floor
San Francisco, California 94111-4788
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Attorneys for GOOGLE LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GOOGLE LLC,
Plaintiff,
vs.
SONOS, INC.,
Defendant.

CASE NO. 3:20-cv-06754-WHA
Related to CASE NO. 3:21-cv-07559-WHA

GOOGLE'S ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE SEALED

1 **I. INTRODUCTION**

2 Pursuant to Civil Local Rule 79-5(f), Google LLC (“Google”) respectfully submits this
 3 Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed in
 4 connection with Google’s Opposition to Sonos, Inc.’s (“Sonos”) Motion for Summary Judgment
 5 Pursuant to the Court’s Patent Showdown Procedure (“Opposition”) and documents filed in support
 6 thereof contain information that Sonos may consider confidential pursuant to the Stipulated
 7 Protective Order (“Protective Order”) entered by this Court. Dkt. 94. Accordingly, Google seeks
 8 to file under seal the documents and information as listed below:

| Document | Portions to Be Filed Under Seal | Designating Party |
|--|---|---------------------------|
| Google’s Opposition | Portions highlighted in blue and green; portions outlined in blue boxes | Google (in green) & Sonos |
| Exhibit 3 to Declaration of Marc Kaplan in Support of Google’s Opposition (“Kaplan Decl.”) | Entire Document | Sonos |
| Exhibit 4 to Kaplan Decl. | Entire Document | Google & Sonos |
| Exhibit 7 to Kaplan Decl. | Entire Document | Sonos |

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 18 Materials and documents may be provisionally filed under seal pursuant to Civil Local Rule
 19 79-5(f) when the document, or portions thereof, “has been designated as confidential by another
 20 party or non-party.” L.R. 79-5(f). Google has redacted the green- and blue-highlighted portions of
 21 its Opposition and portions of the Opposition outlined in blue boxes and submitted the above
 22 exhibits in support thereof under seal because information therein may be considered by Sonos as
 23 “CONFIDENTIAL BUSINESS INFORMATION” or “HIGHLY CONFIDENTIAL – SOURCE
 24 CODE,” or “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective
 25 Order.

26 In compliance with Civil Local Rule 79-5(d) and (e), unredacted versions of the above listed
 27 documents accompany this Administrative Motion and redacted versions of the above listed
 28

1 documents have been filed publicly. In accordance with Local Rule 79-5(c)(3), Google has also
2 filed a Proposed Order herewith.

3 DATED: May 5, 2022

4 QUINN EMANUEL URQUHART & SULLIVAN,
5 LLP

6 By: /s/ Charles K. Verhoeven

7 Charles K. Verhoeven (Bar No. 170151)
8 charlesverhoeven@quinnemanuel.com
9 Melissa Baily (Bar No. 237649)
10 melissabaily@quinnemanuel.com
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12 lindsaycooper@quinnemanuel.com
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14 San Francisco, California 94111-4788
15 Telephone: (415) 875-6600
16 Facsimile: (415) 875-6700

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18 *Attorneys for GOOGLE LLC*

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CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule 5-1, I hereby certify that, on May 5, 2022, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system and email.

6 DATED: May 5, 2022

By: /s/ Charles K. Verhoeven
Charles K. Verhoeven